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Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

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RE: Docket 06-229

Dear Federal Communications Commission,

Idaho's Statewide Interoperability Executive Council (SIEC) opposes the flexible use of 700 MHz public safety narrowband spectrum and the adjacent guard band spectrum for the use of broadband.

Idaho was the second state in the nation to utilize the 700MHz public safety radio system. Our system began in Ada County, Bannock County and Bingham County, in June of 2006. Since that time we now have 35 of 44 counties across the State of Idaho now are utilizing the system which serves over 13,000 subscribers.

Idaho's SIEC strongly opposes any changes to the current narrowband public safety spectrum to allow broadband use. Our opposition is due to the fact that in 2008 the FCC allowed re-banding of the 700 MHz spectrum which had great impacts on Ada, Bannock and Bingham counties radio systems. These counties had been licensed under the original 700 MHz band plan and were forced to re-band to the current plan. This caused substantial financial impact on these counties along with operational hardships requiring the re-programming and re-licensing of their radio systems and their subscribers costing them thousands of dollars.

Idaho's SIEC is determined to not repeat financial disaster. We have determined that the mixed use of narrowband and broadband channels would mean we could lose close to 400 narrowband channel pairs in Idaho. This would cause an impact which would leave public safety subscribers with only 25% capacity for voice use in the narrowband spectrum. This loss of capacity would be devastating to our statewide radio system and to our public safety users. Idaho has already, with the assistance of Region 12, redone our regional planning twice in the past five years causing us great expense and thousands of staff hours.

We are respectfully requesting that you do not allow the flexible use of the 700 MHz public safety narrowband spectrum. Please allow our stakeholders the ability to utilize this spectrum for our critical voice communications. This unaltered spectrum is critical for our voice communications and is absolutely essential for the safety of our public safety responders and the citizens and visitors of Idaho whom they serve.

Sincerely,

R. Mark Lockwood, Chair, Idaho SIEC